**Executive summary**

**"Mid-term evaluation of the progress in the implementation**

**of the programmes of the EEA FM and NFM 2014-2021"**

**Contracting Authority: Administration of the Council of Ministers**

**Contractor: Econometrica Ltd**

**Sofia**

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# **Executive Summary**

The mid-term evaluation of the progress in the implementation of the EEA FM and NFM 2014-2021 programmes is carried out on the basis of Chapter 10. Evaluations of the EEA FM Implementation Regulation 2014-2021 and the NFM Implementation Regulation 2014-2021.

**Goals of the Mid-Term Evaluation**

**The overall goal** of the "Mid-term evaluation of the progress in the implementation of the programmes of the EEA FM and NFM 2014-2021" is to carry out an mid-term evaluation of the implementation of the programmes listed in I.1 of the Technical Specification (TS), financed under the EEA FM and NFM 2014-2021. The evaluation is expected to contribute to improving the appropriateness, efficiency and effectiveness in programme implementation, through:

* providing all stakeholders involved in the management, monitoring and control of the programmes with an independent and objective analysis of the facts and findings of their implementation;
* analyzing the progress and the probability of achieving or not achieving the goals and outcomes pre-set in the programmes;
* providing, based on facts and findings, of recommendations to be used for taking action towards improvement of the quality of programme management and implementation.

**The specific objectives** of the evaluation are:

* To assess the progress in the implementation of the programmes since the signing of respective Programme Agreements by June 30, 2020, on the basis of separate analyses and evaluations of each of the programmes listed in I.1 of the TS. More specifically the listed programmes are subjected to analysis in terms of their objectives, outcomes and the products that are expected to be realized from the implementation of financed interventions/projects;
* To evaluate the expediency of the application of the programmes under I.1 of the TS, which should be done on the basis of separate analyses and evaluations of each of the indicated programmes, taking into account their specific target groups and specific objectives;
* To evaluate the effectiveness and efficiency of the implementation of the programmes under I.1 of the TS, which should be based on separate analyses and evaluations of each of these programmes, taking into account their specific target groups and specific objectives;
* To evaluate the achieved results of the interventions under the programmes listed in I.1 of the TS at a general programme level, as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes;
* To evaluate identified problems and good practices (strengths and weaknesses) in the implementation of the programmes listed in I.1 of the TS, as well as to formulate practical and useful recommendations aimed at overcoming the identified problems that may serve as a tool in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the programmes in the period from the signing of the Programme Agreements between the NFP and the EEA FM Office until June 30, 2020, and it assesses the possibility of achieving the pre-set goals and results within the implementation deadline of the projects – April 30, 2024. In order to achieve the objectives of the mid-term evaluation of the EEA FM and the NFM 2014-2021, it provides answers to the key questions set out in the TS.

**Main Criteria of the Mid-Term Evaluation**

Several main criteria have been taken into account in the process of elaborating the evaluation:

* + Appropriateness (relevance) – to what extent the objectives of the programmes and the interventions included in them correspond to the existing socio-economic needs, policies and priorities of the country, the needs and problems of the target groups to be addressed through the respective programmes;
  + Efficiency – degree of actual or expected achievement of the goals and outcomes determined at the programme level (achievement of the pre-set indicators for result and product);
  + Efficacy – to what extent the results achieved correspond to the costs incurred; whether the costs of achieving results are comparable to similar programmes funded by other donors;
  + Applicability of the assistance – analysis of the objectives of the programme and their adequacy in relation to the changes in the social, economic and political aspect during the programming period.

**Methodology of the Mid-Term Evaluation**

The mid-term evaluation was carried out in accordance with the guidelines for the evaluation of the EEA FM and the NFM 2014-2021 introduced in the Results Guideline (<https://eeagrants.org/resources/2014-2021-results-guideline>).

**Target groups, sources of information, and methods**

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| **Target groups / sources of information** | **Methods for collection and analysis of the information** |
| National Focal Point (NFP) | * + - * Introductory meeting (discussion on the objectives, methods and results of the mid-term evaluation)       * Online disussion |
| Programme Operators (PO) | Online in-depth group interview |
| Donor Programme Partners (DPPs) | Online questionnaire |
| Individual implemented projects (promoters, partners, experts) | Case-studies – online interviews with people working in the selected projects funded under the programmes |
| Programme and projects documents | Desk research (document analysis) |

**Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism**

On December 9, 2016 a Memorandum of Understanding on the implementation of the EEA Financial Mechanism 2014-2021 was signed between Iceland, the Principality of Liechtenstein, the Kingdom of Norway and the Republic of Bulgaria. A Memorandum of Understanding on the implementation of the Norwegian Financial Mechanism 2014-2021 was also signed between the Republic of Bulgaria and the Kingdom of Norway. For the 2014 - 2021 programming period (the projects are implemented until April 30, 2024), the grant provided to Bulgaria amounts to EUR 210.1 million. The net amount of financial assistance under the EEA FM for the 2014-2021period, which will be provided to Bulgaria amounts to EUR 106,375,000. The net amount of financial assistance provided to Bulgaria under the Norwegian Financial Mechanism (NFM) is EUR 87,967,500.

The financial assistance under the EEA FM and the NFM 2014-2021 is provided for the preparation and implementation of the following programmes in six programme areas, which are subject to the mid-term evaluation:

**А. Programme areas: Local Development and Poverty Reduction, Children and Youth at Risk, Roma Inclusion and Empowerment**.

**Programme: *Local Development, Poverty Reduction and Enhanced Inclusion of Vulnerable Groups***

**Total budget:** EUR41 176 471; **EEA programme grant**:EUR35 000 000

**B. Programme area: Renewable Energy, Energy Efficiency, Energy Security**

**Programme:** ***Renewable Energy, Energy Efficiency, Energy Security***

**Total budget:** EUR 32,941,176; **EEA programme grant**: EUR 28,000,000

**C. Programme areas: Environment and Ecosystem, Climate Change Mitigation and Adaptation**

**Programme:** ***Environment Protection and Climate Change***

**Total budget: EUR** 15,294,118; **EEA programme grant**: EUR 13,000,000

**D. Programme area: Cultural Entrepreneurship, Cultural Heritage, Cultural Cooperation**

**Programme:** ***Cultural Enrepreneurship, Heritage and Cooperation***

**Total budget:** EUR 11 764 706 **EEA programme grant**: EUR 10 000 000

**E. Programme areas: International Police Cooperation and Combatting Crime; Asylum and Migration; Good Governance, Accountable Institutions, Transparency**

**Programme:** ***Home Affairs***

**Total budget:** EUR 25 294 118; **NMF programme grant**: EUR 21 500 000

**F. Programme areas: Correctional Services and Pre-trial Detention; Effectiveness and Efficiency of the Judicial System; Strengthening Rule of Law**

**Programme:** Justice

**Total budget: EUR** 35 294 118; **NMF programme grant**: EUR 30 000 000

**Relevance of the Implemented Programmes**

**The goals of the implemented programmes can be evaluated as adequate to the needs and problems of their target groups.** Stakeholders have been consulted, both at national level and by donor countries, highlighting the key challenges of the evaluated programmes. They are developed in accordance with the main national and European strategic and programme documents in the respective programme areas. The priorities, eligible project activities and approaches set in the macro framework of the different programmes correspond to the needs, problems and limitations of the main target groups. They are identified in a broad and systematic process of consultation and coordination with key stakeholders, incl. potential beneficiaries of the programmes. **The needs identified by the stakeholders in the preparation of the programmes determine the logic and content of the planned interventions. At the time of the mid-term evaluation, no need has been identified to supplement or change the objectives and priorities of the evaluated programmes.**

At the same time, the national context has developed since the signing of the Memorandum of Understanding and the Programme Agreements. Although in general the objectives and activities of the programmes remain relevant, they must be carefully monitored and adjusted so that they continue to correspond to the key needs of the target groups. The general objectives and priorities may remain unchanged, but they need to be constantly adapted to the changing national context, and the programmes must maintain a strategic approach to the activities carried out. Other key stakeholders are working in some of the areas covered by the programmes (eg. the European Structural and Investment Funds – ESIF). Therefore, the situation must be monitored regularly to ensure that the programmes remain up-to-date and that all measures are implemented in a coordinated and complementary manner with other national and external initiatives.

**Regarding the design of the programmes, two partner organizations from the donor countries (DPPs) express considerations that could be taken into account when structuring the next programming period of the EEA FM and the NFM.** According to the Norwegian Association of Local and Regional Authorities, the way in which the programme areas for local development (PO 10), inclusion and empowerment of the Roma (PO 07) and children and young people at risk (PO 08) are combined is to the detriment of a fully systematic and a comprehensive approach to local development, as the focus is usually on measures to support disadvantaged groups and not on the dynamic development of local communities. If local development is the main focus of the programme, there could be more integrated measures in this area. The DPP of the Justice programme (the Norwegian Correctional Service – KDI) proposes in future programming periods a separate programme for the correctional services sector to be launched.

**Progress and Achieved Results in the Implementation of the Programmes**

**All agreements for the implementation of the six evaluated programmes have been signed. The Management and Control Systems (MCS) at the national level are approved by the EEA Financial Mechanism Office (FMO) and the MCSs at programme level are approved by the NFP.** The integration of the programmes in the Information System for Management and Monitoring (ISMM) has been implemented, which is a successful step to ensure compliance with the principles of good governance and transparency. Matchmaking events were held in a constructive spirit of cooperation and friendship. **The implementation of the activities under all programmes has started, which, however, is uneven and varying progress has been noted in their implementation.** For the evaluation period, the POs prepare and start application procedures for 26 pre-defined projects and 11 calls for project proposals. Following evaluation and selection procedures, grant contracts were signed for 23 pre-defined projects and for four projects approved under one open call. As of the final date of the mid-term evaluation (June 30, 2020), evaluation and selection procedures are under way for a small grant scheme, three open calls and four pre-defined projects. In four of the announced calls for project proposals, the deadline for submitting project applications has not expired. Guidelines for applying for three open calls in the for *Renewable Energy, Energy Efficiency and Energy Security*, *Cultural Entrepreneurship, Heritage and Cooperation* and *Justice* programmes are being prepared.

**It can be concluded that starting and reaching the implementation phase of projects takes a long time, and in the middle of the programming period a significant share of projects have not started or are in the initial implementation phase, which could create a potential risk for their effective implementation.** Due to various circumstances, three pre-defined projects were withdrawn by the project promoters – one in the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme with the Council of Europe as the project promoter and two in the *Home Affairs* Programme with project promoters the Child Protection Agency and the State Agency for National Security. Since the objectives of the projects remain a priority, the POs have prepared proposals for their replacement with other projects and an open call. The proposals are under discussion with FMO.

**Effectiveness and Efficiency of Programme Implementation**

The planned initiatives in the implemented programmes are aimed at interventions, which at this stage can be assessed as appropriate, realistic and traceable in terms of the objectives of the EEA FM and the NFM. They are adequate to the needs and priorities of Bulgaria in the programming period and largely correspond to the problems and needs of the target groups of the programmes. At the same time, **the implementation of the programmes, projects and specific measures and activities financed by the EEA FM and the NFM is at an early stage or has not started at all, which does not allow for definitive assessments of their effectiveness and efficiency.**

To measure the degree of achievement of the general and specific objectives of the programmes and the expected results of the supported interventions, a **system of indicators** has been developed, through which it is possible to examine the progress in their implementation. This system can be assessed by applying the widely accepted SMART criteria in terms of the specificity, measurability, achievability, realism and timeliness of the indicators, which are expected to be:

* Specific – the indicators are specific and adequately reflect the content of the general and specific objectives of the programme;
* Measurable – indicators are aimed at a desired future state and are quantified (most of them) so as to allow measurement;
* Achievable – for the indicators are set target values, which are achievable, but for some of them no basic values are indicated;
* Realistic – the target values of the indicators are realistic and relevant to the expected results;
* Timely – specific deadlines are defined for the implementation of the program and reaching the target values of the indicators.

The restrictions caused by the emergency pandemic situation lead to some changes in the schedule or the manner of implementation of the activities under the agreed projects, to the postponement of calls for project proposals, extension of the deadlines for their submission to the evaluation procedures. So far, however, **no insurmountable obstacles to the implementation of the objectives and results of the programmes have been identified, although difficulties and a lower effect of some of the implemented activities** (such as field work, exchange of experience, exchange of visits with partner organizations, organization of educational and cultural events, monitoring of ongoing projects on site and others) **are reported**.

**The amount of the provided financial support under the EEA FM and the NFM for the individual programmes can be assessed as significant and corresponding to the pre-set program goals and the needs of the target groups.** This assistance complements the existing external funding provided by the European Structural and Investment Fund (ESIF 2014-2020) through the EU operational programes "Science and Education for Smart Growth", "Human Resources Development", "Regions in Growth", "Rural Development ". Taken in consideration is also the funding through the Bulgarian-Swiss Cooperation Program with a total volume of 76 million Swiss francs in priority areas for the country (including the inclusion of vulnerable groups).

**The financial resources allocated for the implementation of specific projects are also assessed as sufficient to achieve the expected results.** There is an increased interest in some of the funded initiatives, but the number of supported projects is limited. At the same time, other projects are dropped, their launching is postponed or interest in them is limited. In this regard, in the course of the interim evaluation, some **proposals were made for relocation of financial resource**s under some of the implemented programmes. There is currently a proposal from the PO for reallocation of funds under the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* programme from the INCLUDE project to the scheme for the establishment of new youth centers. This proposal is still being considered but will probably be supported by the Council of Europe (IPO) as shared in the online survey. Relocating additional financial resources would provide an opportunity to support good projects for the construction of youth centers in other municipalities that express a desire and readiness for this.

The development of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme is assessed by the DPP (the Norwegian Arts Council) as too slow. Time for the implementation of major cultural heritage projects, which include the construction of infrastructure provided for in Outcome 1, is limited and the development of a call for proposals has not yet started. The DPP proposes to reallocate funds from Outcome 1 to Outcome 2 to ensure the efficient use of the Programme's financial resources. The projects under Outcome 2 have a shorter implementation period (1-2 years), and funds can be transferred to the forthcoming second call for projects under it. However, the evaluator does not recommend the acceptance of the DPP proposal, as it may lead to financial restriction of result 1, where infrastructure costs are foreseen (revitalization and renovation of spaces for presentation of cultural heritage, job creation, etc.). This would have a negative effect on the sustainability and scope of the implemented programme. The PO considers that the redirection of funds from Outcome 1 is not necessary, as the implementation of projects within the framework of the outcome will significantly contribute to achieving the objectives of the programme and ensuring the sustainability of the achieved results. This position is also supported by the NFP.

Under the *Renewable Energy, Energy Efficiency and Energy Security* Programme, a procedure has been launched to redirect funds from small grant schemes to finance another 3-4 projects for rehabilitation and modernization of street lighting, where very good project proposals have been received.

**Risks of not achieving the planned goals and results**

In the course of the elaboration of the mid-term evaluation, several external and internal risks were identified that could hamper the attainment of the objectives and results of the EEA FM and the NFM. Among the main external risks are:

***Epidemiological risks***

The restrictions caused by the emergency pandemic situation lead to changes in the schedule or the manner of implementation of the activities under the agreed projects, to the postponement of the launch of the calls for project proposals, and to the extension of the procedures for their evaluation. It is also difficult to organize events, personal contacts, visits and ongoing on-site monitoring, planned trips in the country, meetings with international partners, exchange of experience and the establishment of bilateral partnerships. Working in an online environment reduces these risks, but does not eliminate them completely, and some of the planned activities are postponed. In general**, the implementation of anti-pandemic measures does not yet pose a threat to the achievement of the objectives of the implemented projects, but it could happen if the current epidemiological situation is maintained for a long time.**

***Economic risks***

Bulgaria is among the countries that are most affected by the Covid-19 pandemic in the EU. According to some forecasts, the Bulgarian economy will begin to recover smoothly in 2021, but will not reach pre-crisis levels of key economic indicators (gross domestic product, economic growth, investment, unemployment, etc.). **Funding from the EU and other donors, including the EEA FM and the NFM, will remain a significant financial source for overcoming the negative economic and social consequences of the Covid-19 proliferation**. This makes the implementation of the programmes even more exigent. At the same time, the possible long-term continuation of the economic difficulties in the country may create problems in the implementation of some of the programme initiatives.

***Political risks***

**Political instability and the upcoming parliamentary and presidential elections in 2021** may lead to changes in programme management teams and delays in programme implementation. The NFP and the POs have experience in dealing with challenges arising from government changes and can reduce this risk by relocating responsibilities to ensure strict compliance with the Management and Control Systems.

***Risks of manipulative formation of negative public attitudes towards FM of the EEA and NFM***

**A relatively new risk for the implementation of the programmes supported by the EEA FM and the NFM (2014-2021) is the manipulative distrust created by certain political and media circles in the financial support of Norway, in particular with regard to child care.** At the beginning of 2019 the draft National Strategy for the Child 2019-2030, developed in broad consultations with the participation of over 200 NGOs and institutions working for children's rights, was presented for public discussion. Opponents of the strategy say it is based on the Norwegian model of child protection, and was drafted by Norway, which has special interests in Bulgaria's childcare reform. It should be explicitly emphasized that under the EEA FM and the NFM no funding was provided for the development of a National Strategy for the Child, and there were no funded projects aimed at introducing elements of the Norwegian child protection system. This campaign goes beyond the childcare system and also targets NGOs, their international donors, foreign aid in general, human rights organizations and activists, especially those related to the rights of Roma and other vulnerable groups (LGBT, immigrants, refugees).

The NFP closely monitors the topic and on June 3, 2019, in coordination with the Norwegian Embassy, published an opinion on the Internet portal of the Financial Mechanisms. The opinion denies any link between the National Strategy for the Child and the EEA FM and the NFM. The decision of the NFP is to emphasize the positive news and good practices for successful cooperation between organizations and institutions from Bulgaria and Norway, as a counterpoint to the negative campaign. Positive examples of popular results from supported projects and the positive role of donor countries are provided. The approach was presented at the annual meeting in October 2019, including the idea of project visits by journalists. On this basis, a concept for the visits was developed, discussed at a working meeting with the Norwegian Embassy on March 5, 2020. The signing of a media monitoring agreement also allows the NFP and the Norwegian Embassy to monitor the daily information flow and react if necessary, in cooperation with the POs, to publications with incorrect content.

Some internal risks for the implementation of the programmes financed under the EEA FM and the NFM have also been identified:

***Insufficient administrative and project management capacity in small municipalities***

This risk can be mitigated by training and support provided by the POs to the beneficiaries throughout the project application and implementation process. It is also possible to select projects in several stages (for example, initial application in the form of conceptual ideas and subsequent development into complete project proposals). The POs can provide ongoing support and monitoring to project promoters during project implementation.

It is also established that the capacity of municipalities to design adequate and meaningful integrated interventions for Roma inclusion and empowerment is limited. Municipal projects are well developed technically, but without a real understanding and focus on sustainable social change in the situation of Roma communities. Therefore, when it comes to the Roma empowerment, the way of preparing these projects and the degree of involvement of the local Roma communities is crucial.

***Delayed procedures for changing/updating programmes***

Delays in some of the implemented programmes and projects create a risk of unsuccessful implementation of the activities on time. This risk can be mitigated by a more rigorous and focused management of the next phase of the programmes. The postponement of international travel and contacts also creates a risk of failure to achieve the expected results of bilateral activities and failure to establish a sufficient number of bilateral partnerships. With the help of the program partners from donor countries, program operators can mitigate this risk by organizing bilateral relations events, including online.

**In the context of rapid and sometimes radical changes in the socio-economic life, it is expedient to optimize the operational procedures in case of need for change and/or updating of the programmes.** It is advisable to speed up the procedures related to the discussion and approval of proposals for change/replacement of problematic projects. It is necessary to strictly observe the deadlines approved in the MCS at the national level and in the regulations. Within these deadlines the NFP, the Cooperation Committee and the FM Office must discuss and give their opinion on the proposals made by the POs for change/update of specific interventions. The period between the development of the Guidelines for Applicants and their publication is sometimes too long, which creates problems in planning (including financial planning, which is associated with the payment of advances to beneficiaries) and the implementation of projects.

***Communication Risks***

The Covid-19 pandemic is a significant challenge for communication and publicity at all levels of implementation of programmes and projects supported by the EEA FM and NFM 2014-2021. In the conditions of emergency, the planned events are either postponed or held in a virtual environment. Despite the limitations, regular meetings of the communication group are held to discuss future steps, lessons learned and good practices. The group is an important tool to ensure that horizontal messages are transmitted to the target groups and provide adequate visibility for the use of EEA FM and NFM grants.

**Roma focus of the implemented programmes**

The social and economic inclusion of the Roma is a priority of the EEA FM and the NFM for the current programming period and provides an opportunity to support the Bulgarian government in the implementation of the National Strategy for Roma Integration. The total amount of funds earmarked for measures affecting the Roma population is EUR 18 048 416, which corresponds to 14% of the total budget of the EEA FM and NFM programmes. **The NFP and the POs seek coordination and synergies between the various EEA programmes and the Norwegian Financial Mechanisms 2014-2021 related to Roma inclusion by involving in the consultation process all stakeholders involved in the social inclusion and empowerment of the Roma at national and European level.**

The NFP has established very good cooperation with various representatives of the Roma civil society, who perceive its activity as really aimed at the social inclusion and empowerment of the Roma. Roma NGOs actively participate in the NFP stakeholder consultation meeting on Roma-focused programmes. The proposals made by Roma NGOs for specific measures are also reflected in the conceptual notes of the respective programmes, and in some cases are fully included (for example in the *Justice* programme). Based on the signed programme agreements, the NFP develops and submits a Roma Inclusion Plan at the national level, which is approved by the FMO.

**Some aspects of the socio-political context in Bulgaria may negatively affect the effectiveness of the implementation of the national policy framework for Roma inclusion and the achievement of the goal of social inclusion and empowerment of the Roma.** The Roma issue is largely politicized and anti-Roma sentiments are generated, especially in an election situation, which sometimes lead to protests in various settlements and even to committing crimes of ethnic hate. The public debate is increasingly dominated by proposals for the “integration” of the Roma through strict administrative and penal approaches, which form a negative public opinion towards the Roma.

**The identified problems in the political and social context are a challenge for all programmes aimed at Roma inclusion.** Programme and project teams have good professional skills to ensure effective management of financial instruments, but knowledge of approaches to Roma inclusion and achieving meaningful and sustainable results is still insufficient. This raises the need to increase the capacity for effective programming and project management in the field of social inclusion and empowerment of the Roma through training, exchange of experience with other countries, setting up advisory groups of experts with the participation of Roma representatives.

**The existing negative stereotypes towards the Roma both among the Bulgarian society and among some institutions represent a risk for the achievement of the goals for the inclusion and empowerment of the Roma.** There is a certain reticence in discussing the issues of Roma participation in the design and implementation of projects, and their role is perceived primarily as beneficiaries of the implemented programmes and projects. The lack of understanding of the necessary participation of the Roma not only as passive users of services, but also as equal partners in the development and implementation of various projects with Roma focus, poses a risk to achieving the goals of empowerment and inclusion of the Roma in society.

**Problems and good practices in the management and implementation of programmes**

Some problems have been identified in connection with the management of the implemented programmes and projects:

* Withdrawal of some pre-defined projects due to organizational and administrative problems of their beneficiaries, failure to take into account the positions of key stakeholders or existing public attitudes;
* Some problems have been identified, either with the identification of donor project partners within a reasonable period of time (e.g. in the *Environmental Protection and Climate Change* programme), or with the introduction of new donor project partners in already agreed conditions of predefined projects (for example in the *Home Affairs* programme).
* For the DPP of the *Home Affairs* Programme (Norwegian Police Directorate), it is a problem that in the development phase of the projects, the costs for their preparation are not eligible. It is noted that DPP representatives from the Norwegian Police Directorate must sign personal declarations and submit CVs when entering into a partnership with Bulgarian institutions. Such a requirement does not exist in any other beneficiary country of the EEA FM and the NFM in which they participate.
* The Norwegian Association of Local and Regional Authorities has identified some problems in the management of the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme: First, delayed procedures in launching calls for proposals, each of which is progressive, not synchronized. Calls are developed with specific rules for each pre-defined project, which is unnecessary and causes delays. Second, the terms of reference for the evaluators in the selection of project proposals focus more on the technical than on the quality criteria. The evaluators could not explain their arguments to the selection committees, which caused delays and concerns about the transparency of the process. Third, there are some problems with the measurement of some indicators (for example, in the GALOP project), as obtaining information about their values implies significant financial costs that are not planned in the project budget. Discussions are under way to address this issue, because if some of the indicators are difficult to measure, it is not clear whether they have really been achieved.

In the course of the mid-term evaluation, **good practices in the management and implementation of the evaluated programmes** were identified, among which the following can be singled out:

**First, the four projects related to the upgrading and development of youth centers in Plovdiv, Stara Zagora, Dobrich and Vratsa,** created in the previous programming period, can definitely be defined as good practice, creating sustainable models that can be replicated in other municipalities. The Youth Centers in Plovdiv and Stara Zagora have been awarded with the special "Quality Label" by the Council of Europe, which guarantees that the youth centers operate in accordance with the high standards of the Council of Europe and its values, as part of a wider international network. The network encourages activities in five specific areas – education, social activities, youth development, knowledge and innovation, exchange of experience and cooperation across countries. Several conditions and prerequisites for the transformation of these projects into good practice and a successful model for youth work are identified:

* **Effective cooperation and commitment of all stakeholders.** There is a clear political will and support (including financial) of local authorities for the implementation of projects for the establishment and development of youth centers.
* **Use of good international practices and application of high standards, which in this case are proposed by the Council of Europe**. Its representatives actively participate in the activities of the youth centers by offering trainings, mentoring, consultations, joint initiatives, exchange of experience and others.
* **Active involvement and empowerment of young people not only as project beneficiaries, but also as active participants in the planning and implementation of youth centers in roles of youth workers, mediators, trainers, community leaders, influencers, volunteers and others.** Emphasis is placed not so much on individual and ad-hoc activities, but on lasting and complex youth initiatives, which are oriented towards achieving long-term effect and building a sustainable capacity to work with young people.
* **Participation in a national and international network of youth centers, which offer wide opportunities for exchange of experience and joint initiatives**. These networks are constantly expanding with the inclusion of new youth centers that can use the experience of existing ones.
* **Opportunity to replicate the tested good practices and sustainable models for the work of the youth centers.** Proof of this is the successfully conducted procedure for recruitment, evaluation and selection of project proposals for the establishment of four new youth centers.
* There are conditions for **ensuring sustainability of the projects** through subsequent municipal funding and self-financing.

**Second, opportunities have been created for development and upgrading of implemented projects in both the previous and the current programming period.** There are prerequisites and expressed readiness to ensure sustainability by subsequently securing their funding from the state budget, municipalities and generated own funds. For some projects, co-financing from various national and international sources is registered. The practice of the project "Rehabilitation Center for Children with Oncohematological Diseases" implemented by the Municipality of Kostinbrod is good. Its infrastructure is built under another project, but the offered service is financed under the programme by the EEA FM. This pilot project is expected to receive state funding through a delegated budget.

A good example of achieving a synergistic effect is the project "Innovative models of community care for people with chronic diseases and permanent disabilities", implemented by the Bulgarian Red Cross (BRC). The applied model of community care was initially tested by the Bulgarian Red Cross under the project "Home care for independent and dignified life", funded by the Swiss Agency for Development and Cooperation in partnership with the Ministry of Healthcare and the Ministry of Labour and Social Policy. This approach has also been adopted by the ESIF in the framework of the Patronage Care for the Elderly and People with Disabilities programme. The provision of national funding can ensure the sustainability of the community care services for people with chronic diseases and permanent disabilities provided by the BRC.

A good practice is also the continuing digitalization of cultural heritage sites, which started in the previous programming period under the BG08 programme "Cultural Heritage and Contemporary Art". Back then eight projects for digitalization were supported and they can now be upgraded.

**Third, programmes funded by the EEA FM and the NFM, with the exception of those managed centrally by the EEA FM Office, are implemented in cooperation either with partner organizations from donor countries (DPPs) and/or with international partner organizations (Council of Europe).** All programmes have a good strategic and operational partnership with DPPs and international partner organizations. DPPs participate in all meetings of the Cooperation Committee and provide assistance mainly in the implementation of pre-defined projects, signing of partnership agreements, negotiating the participation of partners and the distribution of financial resources between them, providing opinions and comments on the draft Guidelines for Applicants for Open Procedures and Small Grant Schemes launched during the period. A good example is the Norwegian National Association of Local and Regional Authorities, which is a partner in several pre-defined projects in various programmes and has significant experience in working with municipalities. NAMRB is satisfied with the cooperation in the implementation of their joint project "Growth by activating local potential (GALOP)".

**Sustainability of the international partnership is registered.** The Council of Europe (CoE) has been an international partner in the previous programming period and has been particularly useful in the areas of administrative capacity building and Roma inclusion in the Local Development, Poverty Reduction and Improved Vulnerability Inclusion and Justice programmes. At project level, the CoE ensures compliance with its standards, the recommendations of the supervisory authorities, human rights and the rule of law standards, as well as compliance with the case law of the European Court of Human Rights.

As a result of organized events that took place in 2019 and aimed at creating contacts amd exchange of experience, supported at national or programme level, a significant number of project proposals were submitted with donor project partners – 88 projects out of 107 project proposals submitted in the call for municipal infrastructure of the *Renewable Energy, Energy Efficiency and Energy Security* programme; 61 projects out of 114 under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme; 11 projects out of 12 project proposals for the establishment of youth centers under the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme.